

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS AND WILLIAM ZHANG, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and DANIEL LARIMER,

Defendants.

Civ. No. 1:20-cv-2809-LAK

CLASS ACTION

CRYPTO ASSETS OPPORTUNITY FUND LLC and JOHNNY HONG, Individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, DANIEL LARIMER, IAN GRIGG, and BROCK PIERCE,

Defendants.

Civ. No.: 1:20-cv-3829

CLASS ACTION

**[PROPOSED] ORDER GRANTING THE MOTION OF  
THE CRYPTO ASSETS OPPORTUNITY FUND, LLC FOR CONSOLIDATION OF  
CASES, APPOINTMENT OF LEAD PLAINTIFF,  
AND APPROVAL OF COUNSEL**

Having considered (a) the motion of the Crypto Assets Opportunity Fund, LLC for (i) consolidation of the two above-captioned cases, (ii) appointment of lead plaintiff pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1934 (the “PSLRA”), and (ii) approval of its selection of lead counsel Grant & Eisenhofer P.A. and the Bluhm Legal Clinic of the Northwestern Pritzker School of Law Complex Civil Litigation and Investor Protection Center as lead counsel for the Class (the “Motion”); (b) the memorandum of law in support of the Motion; (c) and the Declaration of Daniel L. Berger and attached exhibits in support of the Motion, it is hereby ORDERED that:

1. The Motion is GRANTED;
2. The two above-captioned cases are hereby CONSOLIDATED;
3. Crypto Assets Opportunity Fund, LLC is hereby APPOINTED as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Exchange Act;
4. The law firm Grant & Eisenhofer P.A. and the Bluhm Legal Clinic of the Northwestern Pritzker School of Law Complex Civil Litigation and Investor Protection Center are hereby APPOINTED as Lead Counsel for the Class; and
5. This Order shall also apply to any subsequently filed or transferred securities fraud actions against Block.One that are consolidated with this Action.

IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2020

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HON. LEWIS A. KAPLAN  
UNITED STATES DISTRICT JUDGE